

## Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claims 1, 6, 10 and 16 have been amended. No claims have been added or canceled. Thus, claims 1-19 are pending.

### Claim Rejections – 35 U.S.C. § 103(a)

Claims 1-19 were rejected as being unpatentable over U.S. Patent 6,154,600 issued to Newman, et al. (*Newman*) in view of U.S. Patent No. 5,729,741 issued to Liaguno, et al. (*Liaguno*). For at least the reasons set forth below, Applicants submit that claims 1-19 are not rendered obvious by *Newman* and *Liaguno*.

Claim 1 recites:

receiving a video signal;  
receiving a first audio signal containing annotations;  
receiving a second audio signal containing environmental sounds  
corresponding to the video signal; and  
converting the annotations into searchable annotations organized  
as hierarchical shot clusters using a voice-to-text conversion system.

Thus, Applicants claim converting annotations into searchable annotations organized as hierarchical shot clusters. Claim 6 is a means-plus-function claim that similarly recites converting annotations into searchable annotations organized as hierarchical shot clusters. Claims 10 and 16 recite similar limitations.

Applicants agree with the Office Action that *Newman* does not disclose converting annotations into searchable annotations using voice-to-text conversion. See Office Action at page 2. Therefore, *Newman* cannot teach or suggest converting annotations into searchable annotations organized as hierarchical shot clusters. *Liaguno* is cited to teach conversion of source information to text. See Office Action at page 3.

However, *Liaguno* does not disclose organizing images or associated text as hierarchical shot clusters. Because neither *Newman* nor *Liaguno* teach or suggest converting annotations into searchable annotations organized as hierarchical shot clusters, no combination of *Newman* and *Liaguno* can teach or suggest the invention as claimed in claims 1, 6, 10 and 16.


Claims 2-5 depend from claim 1. Claims 7-9 depend from claim 6. Claims 11-15 depend from claim 10. Claims 17-19 depend from claim 16. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that no combination of *Newman* and *Liaguno* can teach or suggest the invention as claimed in claims 2-5, 7-9, 11-15 and 17-19.

#### CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-19 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,  
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